

Puerto Rico Telephone Company, Inc.

PRT Larga Distancia, Inc.

Certification of CPNI Filing (February 6, 2006)

EB Docket No. 06-36

EB-06-TC-060

Attestation Acknowledgment

I understand that as a Responsible Executive, I will be required on a yearly basis to sign an attestation form in which I acknowledge my responsibility for the specified regulatory compliance obligations as per Attachment A and to certify that I have developed and maintained a program of internal controls that provides for compliance in the assigned subjects, and to detect and remediate any instances of non-compliance.

To be signed by the Responsible Executive at the beginning of the period:




Tomás Pérez Ducy
Puerto Rico Telephone Co.
Chief Marketing Officer (CMO)

11 May 2005

Date

Regulatory Subjects under the Responsibility of the CMO (Attachment A)

- Carrier Selection Practices:
 - Slamming/ Cramming
 - Individual Case Basis:
 - Contract Tariff
 - Long Distance Carrier Obligations
 - Payphone Audits and Payphone Payment Validation Process
 - Do not call rules
 - MTS Rate Integration
 - CPNI
 - Universal Service including Life line/ Link up Order 04-87
 - VOIP – CALEA / 911 Implementation
 - CAN SPAM ACT
 - FCC/ TRB Reports
 - Corporate Compliance
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PRT/PRTL D 2005 Statement of Operating Procedures Regarding CPNI

Section 64.2009(c) of the Federal Communications Commission's ("FCC's") rules requires that a carrier have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's rules relating to customer proprietary network information ("CPNI"). The Attestation Acknowledgment by Tomas Perez Ducey, Chief Marketing Officer of Puerto Rico Telephone, Inc. ("PRT") and Vice President of PRT Larga Distancia, Inc. ("PRTL D"), provides this certification for PRT (including its wireless operations doing business as Verizon Wireless Puerto Rico) and PRTL D. These companies are together referred to herein as "the Companies." Section 64.2009(c) also requires a statement explaining how a carrier's operating procedures ensure compliance with the CPNI rules. That statement follows.

Compliance Statement

Section 64.2005 Use of Customer Proprietary Network Information Without Customer Approval

(a) Any telecommunications carrier may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (*i.e.*, local, interexchange, and CMRS) to which the customer already subscribes from the same carrier, without customer approval.

(1) If a telecommunications carrier provides different categories of service, and a customer subscribes to more than one category of service offered by the carrier, the carrier is permitted to share CPNI among the carrier's affiliated entities that provide a service offering to the customer.

(2) If a telecommunications carrier provides different categories of service, but a customer does not subscribe to more than one offering by the carrier, that carrier is not permitted to share CPNI with its affiliates, except as provided in Section 64.2007(b).

(b) A telecommunications carrier may not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from that carrier, unless that carrier has customer approval to do so, except as described in paragraph (c) of this section.

(1) A wireless provider may use, disclose, or permit access to CPNI derived from its provision of CMRS, without customer approval, for the provision of CPE and information service(s). A wireline carrier may use, disclose or permit access to CPNI derived from its provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

(2) A telecommunications carrier may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. For example, a local exchange carrier may not use local service CPNI to track all customers that call local service competitors.

(c) A telecommunications carrier may use, disclose, or permit access to CPNI, without customer approval, as described in this subparagraph (c).

(1) A telecommunications carrier may use, disclose, or permit access to CPNI, without customer approval, in its provision of inside wiring installation, maintenance, and repair services.

(2) CMRS providers may use, disclose, or permit access to CPNI for the purpose of conducting research on the health effects of CMRS.

(3) LECs and CMRS providers may use CPNI, without customer approval, to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing call tracking, call waiting, caller ID, call forwarding, and certain centrex features.

(d) A telecommunications carrier may use, disclose or permit access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

The Companies' Statement: The Companies' marketing procedures use CPNI only to provide or market service offerings to customers within the category(ies) of telecommunications services (i.e., local, interexchange, and CMRS) to which the customer already subscribes (subject to the exceptions listed in 47 U.S.C. §222(d) and the exemptions in this subpart). The Companies' marketing procedures share CPNI only with affiliates that provide telecommunications services in the categories to which the customer already subscribes.

Section 64.2007 Approval Required for Use of Customer Proprietary Network Information

(e) A telecommunications carrier may obtain approval through written, oral or electronic methods.

(1) A telecommunications carrier relying on oral approval shall bear the burden of demonstrating that such approval has been given in compliance with the Commission's rules in this part.

(2) Approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by a telecommunications carrier must remain in effect until the customer revokes or limits such approval or disapproval.

(3) A telecommunications carrier must maintain records of approval, whether oral, written or electronic, for at least one year.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(f) *Use of Opt-Out and Opt-In Approval Processes.*

(1) A telecommunications carrier may, subject to opt-out approval or opt-in approval, use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. A telecommunications carrier may, subject to opt-out approval or opt-in approval, disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to (i) its agents, (ii) its affiliates that provide communications-related services, and (iii) its joint venture partners and independent contractors. A telecommunications carrier may also permit such persons or entities to obtain access to such CPNI for such purposes. Any such disclosure to or access provided to joint venture partners and independent contractors shall be subject to the safeguards set forth below in paragraph (2) of this subsection (b).

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(2) *Joint Venture/Contractor Safeguards.* A telecommunications carrier that discloses or provides access to CPNI to its joint venture partners or independent contractors shall enter into confidentiality agreements with independent contractors or joint venture partners that comply with the following requirements. The confidentiality agreement shall: (i) require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which that CPNI has been provided; (ii) disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; (iii) require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

The Companies' Statement: When the Companies disclose or provide access to CPNI to their joint venture partners or independent contractors, they enter into confidentiality agreements with those parties. The agreements meet the requirements and conditions as outlined in subpart U.

(3) Except for use and disclosure of CPNI that is permitted without customer approval under section 64.2005, or that is described in paragraph (1) of this section, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, a telecommunications carrier may only use, disclose, or permit access to its customer's individually identifiable CPNI subject to opt-in approval.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

Section 64.2008 Notice Required for Use of Customer Proprietary Network Information

(a) Notification Generally.

(1) Prior to any solicitation for customer approval, a telecommunications carrier must provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

(2) A telecommunications carrier must maintain records of notification, whether oral, written or electronic, for at least one year.

(b) Individual notice to customers must be provided when soliciting approval to use, disclose, or permit access to customers' CPNI.

(c) *Content of Notice.* Customer notification must provide sufficient information to enable the customer to make an informed decision as to whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI.

(1) The notification must state that the customer has a right, and the carrier has a duty, under federal law, to protect the confidentiality of CPNI.

(2) The notification must specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

(3) The notification must advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, carriers may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.

(4) The notification must be comprehensible and must not be misleading.

(5) If written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

(6) If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

(7) A carrier may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. A carrier also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

(8) A carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

(9) The notification must state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

(10) A telecommunications carrier's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(d) *Notice Requirements Specific to Opt-Out.* A telecommunications carrier must provide notification to obtain opt-out approval through electronic or written methods, but not by oral communication (except as provided in paragraph (f) of this section). The contents of any such notifications must comply with the requirements of subsection (c) of this section.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(1) Carriers must wait a 30-day minimum period of time after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. A carrier may, in its discretion, provide for a longer period. Carriers must notify customers as to the applicable waiting period for a response before approval is assumed.

(i) In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent.

(ii) In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed.

(2) Carriers using the opt-out mechanism must provide notices to their customers every two years.

(3) Telecommunications carriers that use e-mail to provide opt-out notices must comply with the following requirements in addition to the requirements generally applicable to notification:

(i) Carriers must obtain express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;

(ii) Carriers must allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;

(iii) Opt-out e-mail notices that are returned to the carrier as undeliverable must be sent to the customer in another form before carriers may consider the customer to have received notice; and

(iv) carriers that use e-mail to send CPNI notices must ensure that the subject line of the message clearly and accurately identifies the subject matter of the e-mail.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(v) Telecommunications carriers must make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Carriers may satisfy this requirement through a combination of methods, so long as all customers, have the ability to opt-out at no cost and are able to effectuate that choice whenever they choose.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(e) *Notice Requirements Specific to Opt-In.* (1) A telecommunications carrier may provide notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification must comply with the requirements of subsection (c) of this section.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.

(f) *Notice Requirements Specific to One-Time Use of CPNI.*

(1) Carriers may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether carriers use opt-out or opt-in approval based on the nature of the contact.

(2) The contents of any such notification must comply with the requirements of subsection (c) of this section, except that telecommunications carriers may omit any of the following notice provisions if not relevant to the limited use for which the carrier seeks CPNI:

(i) Carriers need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election.

(ii) Carriers need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party.

(iii) Carriers need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as carriers explain to customers that the scope of the approval the carrier seeks is limited to one-time use.

(iv) Carriers may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as the carrier clearly communicates that the customer can deny access to this CPNI for the call.

The Companies' Statement: The Companies use oral notice to obtain customer consent to use CPNI for the duration of the customer call. The oral notice complies with the requirements of this section.

Section 64.2009 Safeguards Required for Use of Customer Proprietary Network Information

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Companies' Statement: The Companies' marketing procedures only make use of CPNI consistent with the FCC's rules for one-time use of CPNI.

(b) Telecommunications carriers must train their personnel as to when they are, and are not, authorized to use CPNI, and carriers must have an express disciplinary process in place.

The Companies' Statement: The Companies' policies regarding treatment of confidential information, including customer information, require that: this information must be used consistent with governing law; this information may only be used as specified by a supervisor; access to this information may only be given to employees who require that information for a legitimate commercial purpose; this information may only be given to third parties that have contracts with the Companies consistent with the terms and conditions limiting disclosure of such information; and any questions regarding interpretations of confidentiality laws and regulations should be referred to the Department of Legal and Regulatory Affairs. All employees must acknowledge in writing that they have received a copy of these policies. In addition, employees engaged in marketing using CPNI are trained in the use of that information. The Companies' Rules of Discipline make clear that any violation of communication privacy rules is punishable by dismissal on the first offence.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

The Companies' Statement: The Companies identify and maintain records of marketing and sales campaigns that utilize CPNI, including records of disclosure to or access by third parties. These records are maintained for a minimum of one year. The content of the records meets the Commission's requirements outlined above.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and

maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

The Companies' Statement: All outbound marketing campaigns involving CPNI must be approved by the Vice President of Marketing for the area in question prior to the campaign. The Companies maintain records of their marketing campaigns and supervisory reviews for a minimum of one year.

(e) A telecommunications carrier must have a corporate officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is, or is not, in compliance with the rules in this subpart.

The Companies' Statement: The May 2005 compliance certificate was signed by Tomas Perez Ducey, PRT Chief Marketing Officer and PRTLD Vice President.

(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

The Companies' Statement: The Companies have not engaged in seeking either opt-out or opt-in consent from their customer base, except as allowed by the FCC's procedures for consent for one-time use of CPNI.